

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

August 30, 2024

Nathan Ochsner, Clerk of Court

United States of America

v.

Walter WILKINS

YOB: 2001

United States

Case No. 7:24-mj-01513-1

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 20, 2022 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*Title 18, USC Section 2422(b)  
Coercion and Enticement

Whoever, using any facility or means of interstate or foreign commerce, knowingly persuades, induces, entices, or coerces any individual who has not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, to wit: Aggravated Sexual Assault in violation of Texas Penal Code Section 22.021

This criminal complaint is based on these facts:

See attachment A

☒ Continued on the attached sheet.

Approved by AUSA D.Walker.

/s/ Juan J. Flores Jr.

*Complainant's signature*

Juan J. Flores Jr, HSI Special Agent

*Printed name and title*☒ Sworn to telephonically and signed electronically  
per Fed.R.Cr.4.1Date: 8/30/2024 at 6:31 p.m.City and state: McAllen, Texas*Judge's signature*

J. Scott Hacker, U.S. Magistrate Judge

*Printed name and title*USMS, McALLEN TX  
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## ATTACHMENT A

On August 29, 2024, Homeland Security Investigations (HSI) in McAllen, Texas, received information from the Hidalgo County Sheriffs Office (HCSO) regarding the online solicitation of a 15-year-old victim of child exploitation (hereinafter referred to as minor victim 1 or "MV1"), who was communicating with an adult male residing in Rio Grande Valley area.

On November 7, 2022, MV1 made an outcry of sexual assault against Walter WILKINS. MV1 stated the incident took place on or about October 20, 2022. MV1 was introduced to WILKINS by a friend and they began to communicate via the social media application, Instagram. MV1 identified the account belonging to WILKINS. HCSO investigators served Meta Platforms, Inc. with a subpoena for the account MV1 identified and received information from Meta Platforms that the account was registered to Walter WILKINS.

MV1 stated WILKINS was 20 years old and was aware that MV1 was a minor. MV1 stated when WILKINS found out MV1 was a minor he responded "Age is just a number". MV1 also stated they spoke multiple times with WILKINS about being in high school. A review of the messages sent by WILKINS to MV1 verified the messages being sent were sexual in nature, including asking MV1 if they could "at least jerk him off" and another message asking for a "handjob" from MV1's friend, who was also a minor.

On or about October 20, 2022, MV1 stated WILKINS picked them up and drove them to a dirt road. When the vehicle came to a stop, WILKINS asked MV1 to perform oral sex on him. They stated they performed oral sex on him and he proceeded to get on top of MV1 and rub his penis on their body. This sexual activity is illegal sexual activity for which WILKINS could be charged with, that is, Aggravated Sexual Assault in violation of Texas Penal Code Section 22.021. After the assault, WILKINS took MV1 back to their house. MV1 resides in Hidalgo County, Texas, and resided in Hidalgo County, Texas, during the time they communicated with WILKINS.

MV1's cellphone, an Apple iPhone manufactured in China, was used to receive the social media messages sent by WILKINS to facilitate the coercion and enticement of a minor to engage in illegal sexual activity in violation of Title 18, United States Code 2422(b).